

# EXHIBIT “C”

**From:** Dougherty, Michael[Michael.Dougherty@wyndham.com]  
**Sent:** Thur 5/9/2019 7:48:32 PM (UTC)  
**To:** Visingard, Cheryl[CHERYL.VISINGARD@LibertyMutual.com]; Liskov, Donald[Donald.Liskov@LibertyMutual.com]  
**Cc:** Christopher Cogan[christopher.cogan@aon.com]; Brogan, Lisa[Lisa.Brogan@LibertyMutual.com]; Masterson, Jay[Jay.Masterson@LibertyMutual.com]  
**Subject:** RE: Human Trafficking Litigation v Wyndham | Counsel Rates

This is fine.

**Michael Dougherty**  
Vice President, Risk Management & Insurance

Wyndham Hotels & Resorts, Inc.  
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O (973) 753-6080  
M (973) 590-4112  
[Michael.Dougherty@Wyndham.com](mailto:Michael.Dougherty@Wyndham.com)

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**From:** Visingard, Cheryl [mailto:CHERYL.VISINGARD@LibertyMutual.com]  
**Sent:** Thursday, May 09, 2019 3:21 PM  
**To:** Dougherty, Michael <Michael.Dougherty@wyndham.com>; Liskov, Donald <Donald.Liskov@LibertyMutual.com>  
**Cc:** Christopher Cogan <christopher.cogan@aon.com>; Brogan, Lisa <Lisa.Brogan@LibertyMutual.com>; Masterson, Jay <Jay.Masterson@LibertyMutual.com>; Visingard, Cheryl <CHERYL.VISINGARD@LibertyMutual.com>  
**Subject:** RE: Human Trafficking Litigation v Wyndham | Counsel Rates

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Michael, I am getting the electronic billing referrals set up for the involved firms and just want to confirm your agreement with the rates that Don proposed and I outlined below. I want to make sure we have address all concerns.

Please let me know if you need additional time to review internally, otherwise I await your confirmation of agreement to finish up the referrals for bill submissions.

Cheryl

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**From:** Dougherty, Michael <[Michael.Dougherty@wyndham.com](mailto:Michael.Dougherty@wyndham.com)>  
**Sent:** Wednesday, May 08, 2019 9:16 AM  
**To:** Visingard, Cheryl <[CHERYL.VISINGARD@LibertyMutual.com](mailto:CHERYL.VISINGARD@LibertyMutual.com)>; Liskov, Donald <[Donald.Liskov@LibertyMutual.com](mailto:Donald.Liskov@LibertyMutual.com)>  
**Cc:** Christopher Cogan <[christopher.cogan@aon.com](mailto:christopher.cogan@aon.com)>; Brogan, Lisa <[Lisa.Brogan@LibertyMutual.com](mailto:Lisa.Brogan@LibertyMutual.com)>; Masterson, Jay <[Jay.Masterson@LibertyMutual.com](mailto:Jay.Masterson@LibertyMutual.com)>  
**Subject:** {EXTERNAL} RE: Human Trafficking Litigation v Wyndham | Counsel Rates

Thanks for this Cheryl and Don.

**Michael Dougherty**  
Vice President, Risk Management & Insurance

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**From:** Visingard, Cheryl [<mailto:CHERYL.VISINGARD@LibertyMutual.com>]  
**Sent:** Wednesday, May 08, 2019 8:45 AM  
**To:** Dougherty, Michael <[Michael.Dougherty@wyndham.com](mailto:Michael.Dougherty@wyndham.com)>  
**Cc:** Haber, Jennifer <[Jennifer.Haber@wyndham.com](mailto:Jennifer.Haber@wyndham.com)>; Martin, Anthony <[Anthony.Martin@wyndham.com](mailto:Anthony.Martin@wyndham.com)>; Christopher Cogan <[christopher.cogan@aon.com](mailto:christopher.cogan@aon.com)>; Liskov, Donald <[Donald.Liskov@LibertyMutual.com](mailto:Donald.Liskov@LibertyMutual.com)>; Brogan, Lisa <[Lisa.Brogan@LibertyMutual.com](mailto:Lisa.Brogan@LibertyMutual.com)>; Masterson, Jay <[Jay.Masterson@LibertyMutual.com](mailto:Jay.Masterson@LibertyMutual.com)>; Visingard, Cheryl <[CHERYL.VISINGARD@LibertyMutual.com](mailto:CHERYL.VISINGARD@LibertyMutual.com)>  
**Subject:** Human Trafficking Litigation v Wyndham | Counsel Rates

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Michael, This email is in follow up to our call on Mon 5/5/19 in which Don Liskov presented our proposed defense counsel rates at the national and local levels and during which you acknowledged your agreement.

For National Coordinating Counsel (NCC) assigned to DLA Piper, Liberty Mutual (LM) agrees to pay the following rates to the firm directly:

50% of the hourly rate up to a maximum\* of:

Partner \$370  
Of Counsel \$300  
Sr. Associate \$300  
Jr. Associate \$280  
Paralegal \$120

\* for example, if the billed partner rate is \$800/hour LM will pay \$370. If the billed senior associate rate is \$650/hour LM will pay \$300. If the billed senior associate rate is \$500, Liberty and Wyndham will each pay \$250.

Please identify any additional billing levels that DLA Piper has proposed.

For all local counsel, nationwide, LM agrees to pay the following rates to the firm directly:

Partner \$185  
Associate \$165  
Paralegal \$95

Thus far, local counsel has been identified as follows:

OH: **Redacted**

PA: Plaintiffs BH and CA - DLA Piper

TX: **Redacted**

For NCC and local counsel, Wyndham agrees to pay the delta of hourly rate above and beyond what LM has agreed to above. For instance, if Wyndham has agreed to pay **Redacted** a partner rate of \$600/hour then LM will pay \$185 and Wyndham will pay \$415. Each firm will bill LM electronically through Lexis Nexis' CounselLink platform at the rates LM agrees to above. By agreement, billing by all firms, both local and NCC, will be subject to LM's Guidelines for Law Firms (attached and amended on an as needed basis with direct communication between the assigned adjuster and counsel). The law firms will bill Wyndham separately for the delta in rate.

Please reply with your agreement to this arrangement.

**CHERYL VISINGARD | CPCU, SCLA, AIC | SR TECH CLAIMS SPECIALIST II**

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